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MEMO ENDORSED

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October 13, 2021

VIA ECF

The Honorable Edgardo Ramos
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

The application is X granted
 denied



Edgardo Ramos, U.S.D.J.
Dated: 12/06/2021
New York, New York


Re: Doe v. The Trustees of Columbia University in The City of New York, et al., No. 21-CV-05839 (ER) (S.D.N.Y.)

Dear Judge Ramos:

We represent Defendant The Trustees of Columbia University in the City of New York and the individual defendants (collectively, “Columbia”) in the above-captioned action. Pursuant to Your Honor’s Individual Practices, Columbia moves to file with redactions an exhibit to its motion to dismiss the amended complaint. In compliance with Your Honor’s Individual Practices, the Court’s standing order No. 19-mc-00583, and the Court’s Electronic Case Filing Rules & Instructions, Columbia is publicly filing the exhibit with the proposed redactions and filing under seal an unredacted version with the proposed redactions highlighted.

As the Court has acknowledged, this is a “Title IX case involving sensitive subject matter and requiring measures to protect party and non-party privacy.” ECF 42 at 2; *see also* ECF 8 (granting pseudonym motion). The exhibit in question is additional pages of the Investigative Report, which include information that might reveal Plaintiff’s and John Roe’s identities and implicate privacy concerns, including with respect to non-party John Roe. Plaintiff attached as Exhibit E to the Amended Complaint only the Findings and Analysis sections of the Investigative Report. *See* ECF 12-1 at 62–110. Columbia is submitting a select set of pages from the Executive Summary and Procedural History sections of the Investigative Report.

Respectfully submitted,



Gabrielle E. Tenzer

cc: Jane Doe